

1 HONORABLE ROBERT J. BRYAN  
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IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF WASHINGTON

7 LAWRENCE HARTFORD, *et al.*,  
8 Plaintiffs,  
9 v.  
10 BOB FERGUSON, *et al.*  
11 Defendants.

No. 3:23-cv-05364-RJB

DECLARATION OF ZACHARY J.  
PEKELIS IN SUPPORT OF  
ALLIANCE FOR GUN  
RESPONSIBILITY'S REPLY IN  
SUPPORT OF MOTION TO  
INTERVENE AS DEFENDANT

NOTE ON MOTION CALENDAR:  
MAY 26, 2023

14 1. I am a partner at Pacifica Law Group LLP, and represent Proposed Intervenor-  
15 Defendant Alliance for Gun Responsibility (the Alliance) in this matter. I am over the age of 18,  
16 competent to testify, and make this declaration based on my personal knowledge.

17 2. I also represent (or represented) the Alliance or its political committee in the  
18 following matters in which it successfully intervened as a defendant to defend Washington gun  
19 safety laws: *Banta v. Ferguson*, No. 2:23-CV-00112-MKD (E.D. Wash. May 19, 2023); *Brumback*  
20 *v. Ferguson*, No. 1:22-cv-03093-MKD (E.D. Wash.); *Sullivan v. Ferguson*, No. 3:22-cv-05403-  
21 DGE (W.D. Wash.); *Mitchell v. Atkins*, No. 3:19-cv-05106 (W.D. Wash.); *Slone v. State*, No. 20-  
22 2-07296-1 (Pierce Cnty. Super. Ct.). In addition, I represent the Alliance's sister organization, the  
23 Oregon Alliance for Gun Safety (the Oregon Alliance), in cases in which the Oregon Alliance has

24 PEKELIS DECL. ISO ALLIANCE FOR GUN  
RESPONSIBILITY'S REPLY ISO MOTION TO  
INTERVENE AS DEFENDANT - 1

25 Case No. 3:23-cv-05364-RJB

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1 successfully intervened to defend an Oregon gun safety law: *Oregon Firearms Fed'n, Inc. v.*  
2 *Kotek*, No. 2:22-cv-01815-IM (D. Or.); *Eyre v. Rosenblum*, No. 3:22-cv-01862-IM (D. Or.).

3. Attached as Exhibit A is a true and correct copy of the court's September 25,  
4 2020 order granting intervention to the Alliance's political committee, Safe Schools Safe  
5 Communities, in *Slone v. State* (Pierce Cnty. Super Ct.).

6 I declare under penalty of perjury that the foregoing is true and correct.

7 EXECUTED this 26th day of May, 2023, at Seattle, Washington.

8 *s/ Zachary J. Pekelis*  
9 ZACHARY J. PEKELIS, WSBA #44557

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24 PEKELIS DECL. ISO ALLIANCE FOR GUN  
25 RESPONSIBILITY'S REPLY ISO MOTION TO  
INTERVENE AS DEFENDANT - 2  
Case No. 3:23-cv-05364-RJB

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## **CERTIFICATE OF SERVICE**

I hereby certify that on this 26th day of May, 2023, I electronically filed the foregoing document with the Clerk of the United States District Court using the CM/ECF system which will send notification of such filing to all parties who are registered with the CM/ECF system.

Dated this 26th day of May, 2023.

 Erica Knerr

Erica Knerr

PEKELIS DECL. ISO ALLIANCE FOR GUN  
RESPONSIBILITY'S REPLY ISO MOTION TO  
INTERVENE AS DEFENDANT - 3  
Case No. 3:23-cv-05364-RJB

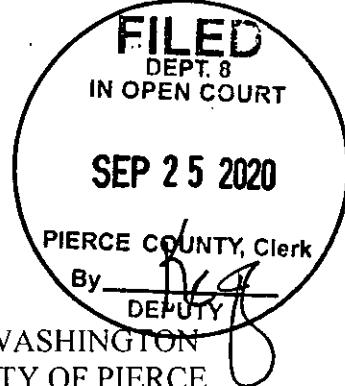
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## EXHIBIT A



HONORABLE GRANT BLINN  
Hearing Set: September 25, 2020

Time: 9:00 AM



SUPERIOR COURT OF WASHINGTON  
IN AND FOR THE COUNTY OF PIERCE

KERRY SLONE, a resident of the state of Washington, GUN OWNERS OF AMERICA, INC., and GUN OWNERS FOUNDATION,

Plaintiffs,

v.

STATE OF WASHINGTON,

Defendant,

No. 20-2-07296-1

[PROPOSED] ORDER GRANTING  
SAFE SCHOOLS SAFE  
COMMUNITIES' MOTION TO  
INTERVENE AS A DEFENDANT

THIS MATTER came before the Court on Safe Schools Safe Communities' (the "Campaign's") Motion to Intervene as a Defendant ("Motion"). The Court has considered the papers and pleadings filed herein, including the following:

1. The Campaign's Motion;
2. Declaration of Renee Hopkins in Support of the Motion, and exhibits thereto;
3. Declaration of Nicholas W. Brown in Support of the Motion, and exhibits thereto;
4. The Campaign's Answer to Plaintiffs' Complaint (Proposed);
5. Plaintiffs' Opposition and supporting declarations, if any;
6. The Campaign's Reply in Support of the Motion, if any;

[PROPOSED] ORDER GRANTING SAFE SCHOOLS SAFE  
COMMUNITIES' MOTION TO INTERVENE AS A  
DEFENDANT - 1

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Based on the above, the Court ORDERS as follows:

1. The Campaign's Motion to Intervene as a Defendant is GRANTED.

Dated this 25<sup>th</sup> day of September, 2020.

**HONORABLE GRANT BLINN**

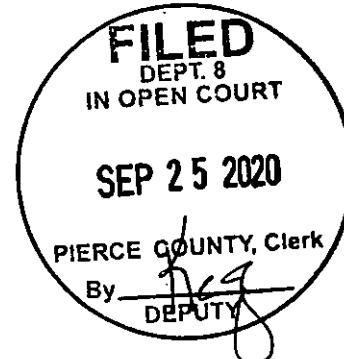
*Presented by:*

PACIFICA LAW GROUP LLP

By s/ Gregory J. Wong

Gregory J. Wong, WSBA #39329  
Nicholas W. Brown, WSBA #33586  
Kai A. Smith, WSBA #54749

*Attorneys for Intervenor-Defendant  
Safe Schools Safe Communities*



[PROPOSED] ORDER GRANTING SAFE SCHOOLS SAFE  
COMMUNITIES' MOTION TO INTERVENE AS A  
DEFENDANT - 2

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